

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION**

LUXOTTICA GROUP S.p.A., OAKLEY,  
INC., and COSTA DEL MAR, INC.,

Plaintiffs,

v.

THE PARTNERSHIPS and  
UNINCORPORATED ASSOCIATIONS  
IDENTIFIED ON SCHEDULE "A",

Defendants.

Case No. 21-cv-03977

**Hon. Steven C. Seeger**

**Magistrate Judge Beth W. Jantz**

**Declaration of Justin R. Gaudio**

## DECLARATION OF JUSTIN R. GAUDIO

I, Justin R. Gaudio, of the City of Chicago, in the State of Illinois, declare as follows:

1. I am an attorney at law, duly admitted to practice before the Courts of the State of Illinois and the United States District Court for the Northern District of Illinois. I am one of the attorneys for Plaintiffs Luxottica Group S.p.A., Oakley, Inc., and Costa Del Mar, Inc. (collectively, “Plaintiffs”). Except as otherwise expressly stated to the contrary, I have personal knowledge of the following facts and, if called as a witness, I could and would competently testify as follows:
2. Since January 1, 2020, Plaintiffs have filed 17 cases asserting claims of trademark infringement, that included a Schedule A, in the Northern District of Illinois. Plaintiff Oakley, Inc. has also filed 34 cases asserting design patent rights. **Schedule B** attached hereto is a true and correct list of these cases.
3. In 2016, Plaintiffs identified and shut down over 30,600 websites offering for sale products bearing counterfeit versions of Plaintiffs’ trademarks. That figure decreased significantly to less than 2,000 domains in 2021 year to date. **Exhibit 1** attached hereto is a true and accurate copy of a chart illustrating the consistent year-over-year decrease.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed on this the 13th day of August 2021 at Chicago, Illinois.

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/s/ Justin R. Gaudio  
Justin R. Gaudio  
Counsel for Plaintiffs  
Luxottica Group S.p.A., Oakley, Inc., and Costa Del  
Mar, Inc.